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Counsel for Defendant HARTMAN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD HARTMAN,

Defendant.

Case No.: CR 20–126 VC

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE STATUS
HEARING TO JUNE 30, 2020, AND
TO EXCLUDE TIME**

Hearing Date: June 9, 2020

The above-captioned matter was set on May 26, 2020, at 10:30 a.m., before this Honorable Court, for a status hearing. On May 12, 2020, the Court moved the status hearing date to June 9, 2020. The parties jointly request that the Court continue this matter to June 30, 2020, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), between May 26, 2020 and June 30, 2020.

Richard Hartman is charged with the possession of child pornography. He made his initial appearance on February 28, 2020, and the magistrate court ordered him released from custody on March 5, 2020. The government is in the process of preparing the discovery for production. Once the discovery is produced, defense counsel will need time to review that discovery and to discuss

1 these materials with her client. For these reasons, the parties respectfully request that the Court
 2 continue this case from June 9, 2020 to June 30, 2020.

3 In addition, the parties stipulate and agree that the ends of justice served by this continuance
 4 outweigh the best interest of the public and the defendant in a speedy trial. The parties further agree
 5 that the failure to grant this continuance would unreasonably deny counsel for Mr. Hartman the
 6 reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 7 Accordingly, the parties agree that the period of time between May 26, 2020 through June 30, 2020,
 8 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
 9 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into account the
 10 exercise of due diligence.

11 IT IS SO STIPULATED.

12
 13 Dated: May 18, 2020

14 STEVEN G. KALAR
 15 Federal Public Defender
 16 Northern District of California

17 /S/

18 _____
 19 ANGELA M. HANSEN
 20 Assistant Federal Public Defender

21 Dated: May 18, 2020

22 DAVID L. ANDERSON
 23 United States Attorney
 24 Northern District of California

25 /S/

26 _____
 27 MOLLY SMOLEN
 28 Assistant United States Attorney

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FOR THE NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,

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Case No.: CR 20–126 VC

**[PROPOSED] ORDER TO CONTINUE
STATUS HEARING TO JUNE 30, 2020,
AND TO EXCLUDE TIME**

Based on the reasons provided in the stipulation of the parties above, and for good cause shown, the Court hereby ORDERS that the status hearing date of June 9, 2020, is vacated and reset for a status hearing on June 30, 2020, at 10:30 a.m.

It is FURTHER ORDERED that the time is excluded, pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), from May 26, 2020 through June 30, 2020.

IT IS SO ORDERED.

Dated: _____

THE HONORABLE VINCE CHHABRIA
United States District Judge